## **REMARKS/ARGUMENTS**

Claims 1-35 are pending in the present application. Claims 1, 14, 15, 16, 19, 20, 26-28, and 33-35 are independent claims. None of the claims were amended in this response.

Claims 1-35 were rejected under 35 U.S.C. §102(e) as being anticipated by *Harris* et al. (US Patent 6,282,183). Applicants respectfully traverse the rejection. Favorable reconsideration is earnestly requested.

Specifically, *Harris* does not teach or suggest the feature "substituting means for substituting personal information of said user contained in first information of which input is controlled by said first input/output control means with second information corresponding to said personal information of said user on a one-to-one basis" where the user is "registered as a member of a predetermined group; and wherein said second information is determined corresponding to said group; and wherein said second input/output control means controls output to said second other information processing device of said first information wherein said personal information of said user is substituted with said second information by said substituting means" as recited in claim 1 and similarly recited in claims 14, 15, and 16.

Harris discloses a peer-to-peer network, where the node addressing is dynamically configurable (col. 1, lines 21-26). The term "peer-to-peer" is defined in Harris to mean having at least common portions of wireless communications protocol and/or capability, where each peer or communication node 20 of communications network 22 may establish personal area network 22. Network 22 is configured in a peer-to-peer architecture so that only a minimal number of network-specific components are used, where each peer 20 can initiate a coupling with other peers 20 without servers being required to manage the couplings. Peers 20 are designed to freely move about within the overlapping communications regions without affecting the network structure or the performance of the communication and thereby not require reconfiguration, setup or activation procedures (col. 4, line 47-col. 5, line13).

Accordingly, *Harris* discloses an ad-hoc networking system to allow node communication among numerous wireless devices. While *Harris* discloses authorization keys for coupling setup (col. 9, lines 10-17) and service coupling (col. 12, line 66 – col. 13, line 15), the authorization keys are not configured to correspond to personal information and to a registered group, and furthermore, the keys are not substituted for the personal information of the

677870/D/1 19

user as recited in the claims. The authorization keys disclosed in *Harris* are conventional keys that are manually distributed to users wishing to remotely control appliances, regardless of their personal information. The personalization data 52 disclosed in *Harris* refers to personal ID codes, PINs, passwords, presents, etc. (col. 6, lines 25-39), where stored presets from appliances are activated upon attempting to control an appliance (col. 13, lines 23-26). Again, there is no substitution or indication of registration corresponding to a group in this data. Accordingly, Applicants respectfully submit the rejection is improper and should be withdrawn.

In addition to the arguments above, *Harris* does not teach or suggest a third/fourth control means as recited in claim 16. The disclosure in EXAMPLE VI of *Harris* recites a specifically manufactured "electronic wallet" that is separate from the embodiments discussed earlier in the document. Accordingly, the integrated circuit disclosed in col. 22 only discloses control devices between the wallet, the provider and a common network (col. 22, lines 3-17).

Furthermore, *Harris* does not disclose a first searching means for searching said distribution firm and second searching means for searching personal attributes as recited in claim 19. The disclosure in col. 17, lines 10-16, col. 19, lines 29-35 and col. 22, lines 45-53 merely describe the handshaking operations that take place when two wireless devices are attempting connection in an ad-hoc wireless network. No mention is made of a distribution firm or personal attributes anywhere in the *Harris* document.

Moreover, *Harris* does not teach or suggest the proposal input/acceptance/identification of corporation accepting configuration recited in claims 20, 26-28, and 33-35. *Harris* discloses a conventional merchant transaction involving a user, merchant and banking sources (col. 24, lines 25-56), however *Harris* does not disclose the proposal configuration recited in the aforementioned claims (see also present application FIG. 11, and related text), in addition to the arguments submitted above.

Furthermore, Applicant notes that certain limitations in the claims are recited in meansplus-function format. Under the MPEP, the USPTO must apply 35 U.S.C. 112, sixth paragraph

677870/D/1 20

in appropriate cases, and give claims their broadest reasonable interpretation, in light of and consistent with the written description of the invention in the application (MPEP 2181). If a prior art reference purportedly teaches identity of function to that specified in a claim, then the Examiner carries the initial burden of proof for showing that the prior art structure or step is the same as or equivalent to the structure, material, or acts described in the specification which has been identified as corresponding to the claimed means or step plus function (MPEP 2182). If the specification defines what is meant by the limitation for the purposes of the claimed invention, the examiner should interpret the limitation as having that meaning (MPEP 2182).

Applicant submits that the Examiner has not met the burden imposed by the MPEP to explain how the configuration in *Harris* is equivalent to the present claims. The ad-hoc wireless node communication system in *Harris* is separate and distinct from the CPU-server configuration disclosed in the present application Accordingly *Harris* does not disclose, teach or suggest the means limitations recited in the pending claims.

In light of the above, the Applicants respectfully submit that the rejection is improper and should be withdrawn. As such, claims 1-35 of the present application are patentable over the art of record. Therefore, Applicant respectfully requests that a timely Notice of Allowance be issued in this case.

Respectfully submitted,

BELL BOYD & LLOYD LLC

BY

Peter Zura

Reg. No. 48,196

P.O. Box 1135

Chicago, Illinois 60690-1135

Phone: (312) 807-4208

Dated: May 23, 2005

· 677870/D/1 21